

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(Camden Vicinage)**

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CHARLES RITTER, General Administrator and  
as Administrator *ad Prosequendum* of  
ROCHELLE RITTER, deceased,

Plaintiffs,

v.

ADDY BROTHERS, LLC; JACOB ADDY;  
AMAZON.COM, INC.; and JOHN DOE(S)  
EMPLOYER (fictitious names),

Defendants.

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Civil Action No.:

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**NOTICE OF PETITION FOR REMOVAL FROM STATE COURT TO FEDERAL COURT**

TO:

Paul V. Orecchia, Esquire  
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**Attorneys for Plaintiff(s) – Charles Ritter as Administrator *ad Prosequendum* of Rochelle Ritter**

**PLEASE TAKE NOTICE** that the defendants, Addy Brothers, LLC; Jacob Addy and Amazon.com, Inc. (hereinafter referred to collectively as “Defendants” or “Addy Brothers”), herein files and submits this Notice of Removal from State Court to Federal Court in the above matter.

The Notice of Petition for Removal is also being filed with the Superior Court of New Jersey – Law Division – Burlington County, pursuant to 28 U.S.C. §1446 (d).

A motion to remove the case from New Jersey State Court to Federal Court will be filed after the Federal Court assigns this matter a Civil Action Number.

**CIPRIANI & WERNER, P.C.**



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Attorneys for Defendants – Addy Brothers, LLC; Jacob Addy  
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DATED: December 8, 2021

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
(Camden Vicinage)**

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CHARLES RITTER, General Administrator and  
as Administrator *ad Prosequendum* of  
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AMAZON.COM, LLC and JOHN DOE(S)  
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Civil Action No.:

**NOTICE OF REMOVAL FROM STATE COURT TO FEDERAL COURT**

Petitioners/Defendants, Addy Brothers, LLC; Jacob Addy and Amazon.com, Inc. (hereinafter referred to collectively as “Defendants” or “Addy Brothers”), hereby files the within Notice of Removal to the United States District Court of New Jersey from the Superior Court of New Jersey, Law Division – Burlington County, and hereby says:

1. This case arises out of a pedestrian/motor vehicle fatal accident that occurred on March 13, 2021 on Campus Drive in the vicinity of its intersection with Sunset Road, in the Township of Burlington, Burlington County, New Jersey. **(Exhibits “A,” and “B”)**

2. On or about September 27, 2021, Plaintiff(s), Charles Ritter as Administrator *ad Prosequendum* of the Estate of Rochelle Ritter, deceased, filed a Complaint against the Defendants, Addy Brothers, LLC and Jacob Addy, in the Superior Court of New Jersey, Law Division – Burlington County, entitled Charles Ritter, et al. v. Addy Brothers, LLC, et al., under docket number BUR-L-2043-21.

**(Exhibit “A”)**

3. Service of the Complaint was made upon defendant(s), Addy Brothers, LLC and/or Jacob Addy, at their address of 631 Talcottville Road – Apt. M7, Vernon, Connecticut 06066 via United Parcel Service (“UPS”) overnight delivery. **(Exhibit “C”)**

4. On or about December 1, 2021, Plaintiff(s), Charles Ritter as Administrator *ad Prosequendum* of the Estate of Rochelle Ritter, deceased, filed an Amended Complaint against the Defendants, Addy Brothers, LLC; Jacob Addy and Amazon.com, Inc., in the Superior Court of New Jersey, Law Division – Burlington County, entitled Charles Ritter, et al. v. Addy Brothers, LLC, et al., under docket number BUR-L-2043-21. **(Exhibit “B”)**

5. Service of the Amended Complaint has not yet been made on the Defendant(s), Addy Brothers, LLC; Jacob Addy and Amazon.com, Inc. **(Exhibit “D”)**

6. Plaintiff alleges damages for, *inter alia*, negligence, wrongful death, survivorship, conscious pain and suffering including, but not limited to “...catastrophic injuries, resulting in her untimely death...” and Plaintiff(s) are demanding \$1,000,000.00 in damages as an Offer of Judgment. **(Exhibit “B”).**

7. Plaintiff(s), Charles Ritter, General Administrator and Administrator *ad Prosequendum* of the Estate of his daughter, Rochelle Ritter, deceased, are citizen(s) of the State of New Jersey as the Estate was formed in Burlington County, and they are domiciled at the address of 1701 Salem Road, Township of Burlington, Burlington County, New Jersey. **(Exhibit “B”)**

8. Defendant, Jacob Addy, is a natural person who is a citizen of the State of Connecticut and is domiciled at 631 Talcottville Road - Apt. M7, Vernon, Connecticut 06066. **(Exhibits “B,” and “C”)**

9. Defendant, Addy Brothers, LLC, is a limited liability company existing and organized under the laws of the State of Connecticut that is domiciled and principally located at 631 Talcottville Road - Apt. M7, Vernon, Connecticut 06066. **(Exhibits “B,” and “E”)**

10. Addy Brothers, LLC is solely owned and operated by Jacob Addy who controls 100% of all of the company shares and who is also a resident of the State of Connecticut. There are no other principals who are members of the LLC. **(Exhibits “B,” and “E”)**

11. Defendant, Amazon.com, Inc., is a corporation organized and existing under the laws of the State of Washington that is principally domiciled at 2111 7<sup>th</sup> Ave, Seattle Washington 98121.

**(Exhibit “F”)**

12. The present case, therefore, is a civil action in which the United States District Court for the District Court of New Jersey has original jurisdiction by virtue of diversity of citizenship of all of the parties pursuant to 28 U.S.C. §1332.

13. Pursuant to 28 U.S.C. §1332, this case involves injuries which, as alleged by Plaintiffs, will exceed \$75,000.00 exclusive of interest and costs as evidenced by the Complaint. **(Exhibit “B”)**

14. In accordance with the applicable Federal Rules of Civil Procedure and/or Federal Statutes, specifically 28 U.S.C.S. §1446 (b), this Notice of Removal has been filed within (30) days after the Petitioners/Defendants received notice of Plaintiff’s Complaint. *See Granovsky v. Pfizer, Inc., et al.*, 631 F.Supp.2d 554, 559 (D.N.J. 2009).

15. Accordingly, pursuant to 28 U.S.C. §1332, this matter is a civil action that may be removed by the Petitioners from State Court to the United States District Court for the District of New Jersey over which the federal court has original jurisdiction.

16. A copy of the Defendants’ answer to the Complaint is attached hereto as **Exhibit “G”** and will be filed separately.

**WHEREFORE**, Petitioners/Defendants, Addy Brothers, LLC; Jacob Addy and Amazon.com, Inc., hereby respectfully requests that the aforementioned civil action commenced against them by Plaintiff be removed to the United States District Court for the District Court of New Jersey for all further proceedings.

Respectfully submitted,

**CIPRIANI & WERNER, P.C.**



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and Amazon.com, Inc.  
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DATED: December 8, 2021